

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

ArborTech Forest Products, Inc.
500 Dearing Ave., Blackstone (Nottoway County) Virginia
Permit No. SCRO31039

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, ArborTech Forest Products, Inc. has applied for a Title V Operating Permit for its Blackstone facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____
Allen Armistead
(434) 582-5120

Air Permit Manager: _____ Date: _____
David J. Brown

Regional Director: _____ Date: _____
T. L. Henderson

FACILITY INFORMATION

Permittee

ArborTech Forest Products, Inc.
500 Dearing Ave.
Blackstone, VA 23824

Facility

ArborTech Forest Products, Inc.
500 Dearing Ave.
Blackstone, VA 23824

County-Plant Identification Number: 51- 135-00037

SOURCE DESCRIPTION

NAICS Code: 321113 (SIC Code: 2421) - Sawmill

The ArborTech Forest Products, Inc. in Blackstone produces dimensional lumber from pine logs by using a sawmill to cut the logs into boards. The boards are then kiln dried and run through a planer to produce the dimensional lumber.

The facility is a Title V major source of Volatile Organic Compounds (VOC). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was issued a Minor NSR Permit dated June 30, 2000, which was amended August 27, 2002 and March 3, 2004. That permit was superseded by a State Major NSR August 17, 2006. The August 17, 2006 permit was superseded again on **Xxxxx yy, 2007**. Through permit limitations this facility is not a major source of HAPs as defined by 40 CFR 63.2, and is therefore not subject to any MACT requirements.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on August 22, 2007. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time. Consent Order (ASCRO5262) issued on October 27, 2006 is active until the completion of a fugitive dust evaluation.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

| Emission Unit ID | Stack ID | Emission Unit Description | Size/Rated Capacity Notes 1 & 2 | Pollution Control Device (PCD) Description | PCD ID | Pollutant Controlled | Applicable Permit Date |
|---------------------------------|-----------------------------|---|------------------------------------|---|--------|----------------------|------------------------|
| Fuel Burning Equipment | | | | | | | |
| B1 | B1-1 | Hurst Boiler Wood-waste fired boiler Model m-4000-WWF | 28.7 MMBtu/hr | Hurst Boiler multicyclone | B1A | PM | August 17, 2006 |
| B2 | B2-1 | Hurst Boiler Wood-waste fired boiler Model m-4000-WWF | 28.7 MMBtu/hr | Hurst Boiler multicyclone | B2A | PM | August 17, 2006 |
| | | | | | | | |
| Kiln Process Equipment | | | | | | | |
| K1 | K1 – 1 thru 10 Note 3 | Wellons 54 foot dual track dry (lumber) kiln | 4.37 MBf/hr | --- | --- | --- | August 17, 2006 |
| K2 | K2 – 1 thru 10 | Wellons 54 foot dual track dry (lumber) kiln | 4.37 MBf/hr | --- | --- | --- | August 17, 2006 |
| K3 | K3 – 1 thru 10 | Wellons 86 foot dual track dry (lumber) kiln | 6.96 MBf/hr | --- | --- | --- | August 17, 2006 |
| Planer Process Equipment | | | | | | | |
| P1 | P1-1 | Howell Metal planer system | 50 MBf/hr | Howell Metal cyclone | P1A | PM | August 17, 2006 |

EMISSIONS INVENTORY

A copy of the 2006 annual emission update is attached. Emissions are summarized in the following tables.

2006 Actual Emissions

| | Criteria Pollutant Emission in Tons/Year | | | | | |
|--------------------|--|------------------|-----------------|-----------------|------|-------|
| Emission Unit | PM | PM ₁₀ | NO _x | SO ₂ | CO | VOC |
| Boiler B-1 | 18.8 | 18.8 | 13.8 | 1.6 | 31.3 | 1.7 |
| Boiler B-2 | 14.6 | 14.6 | 10.7 | 0.1 | 24.4 | 1.3 |
| Boiler B-3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Kilns K-1 thru K-3 | | | | | | 142.8 |
| Planer | 30.1 | | | | | |
| Total | 63.5 | 33.4 | 24.5 | 1.7 | 55.7 | 145.8 |

2006 Facility Hazardous Air Pollutant Emissions

| Pollutant | Tons/Yr |
|-------------------|---------|
| Acrolein | 0.32 |
| Formaldehyde | 1.05 |
| Hydrogen chloride | 2.12 |
| Methanol | 8.82 |

EMISSION UNIT APPLICABLE REQUIREMENTS - Wood-fired boilers B1 and B2

Limitations

The limitation requirements for these boilers are unchanged by this significant modification.

Monitoring

The monitoring requirements for these boilers are unchanged by this significant modification.

Recordkeeping

These boilers are subject to 40 CFR Subpart Dc. The June 13, 2007 changes to this subpart allow fuel usage records for subject boilers burning wood to be kept on a monthly basis, instead of the previous requirement of daily records. The minor NSR permit dated **Xxxxx yy, 2007** for this facility has been changed to remove the requirement for daily fuel records and this change has been carried forward to this Title V modification. The remaining recordkeeping requirements for these boilers are unchanged by this significant modification.

Testing

The testing requirements for these boilers are unchanged by this significant modification.

Reporting

The reporting requirements for these boilers are unchanged by this significant modification.

Streamlined Requirements

None

EMISSION UNIT APPLICABLE REQUIREMENTS - Kilns (K1, K2, and K3)**Limitations**

The throughput limit and emissions limit for the kilns was changed by the **Xxxxx yy, 2007** minor NSR permit. These changes have been carried forward to this significant modification.

Monitoring

The monitoring requirements for these kilns are unchanged by this significant modification.

Recordkeeping

The recordkeeping requirements for these kilns are unchanged by this significant modification.

Testing

The testing requirements for these kilns are unchanged by this significant modification.

Reporting

The reporting requirements for these kilns are unchanged by this significant modification.

Streamlined Requirements

None

EMISSION UNIT APPLICABLE REQUIREMENTS - Planer System (P1)**Limitations**

The throughput limit and emissions limit for the planer was changed by the **Xxxxx yy, 2007** minor NSR permit. These changes have been carried forward for this modification. The remaining limitation requirements for the planer are unchanged by this significant modification.

Monitoring

The monitoring requirements for the planer are unchanged by this significant modification.

Recordkeeping

The recordkeeping requirements for the planer are unchanged by this significant modification.

Testing

The testing requirements for the planer are unchanged by this significant modification.

Reporting

The reporting requirements for the planer are unchanged by this significant modification.

Streamlined Requirements

None

FACILITY WIDE APPLICABLE REQUIREMENTS

The facility wide requirements for the facility are unchanged by this significant modification.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

The General Conditions for the facility are unchanged by this significant modification.

STATE ONLY APPLICABLE REQUIREMENTS

There are no State Only applicable requirements in this permit.

FUTURE APPLICABLE REQUIREMENTS

None

INAPPLICABLE REQUIREMENTS

The inapplicable requirements for the facility are unchanged by this significant modification.

COMPLIANCE PLAN

None

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

| Emission Unit No. | Emission Unit Description | Citation ¹ | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|-------------------|--|-----------------------|---|-----------------------------------|
| T1 | 10,000 gallon above ground Distillate Oil Tank | 9 VAC 5-80-720 B | VOC | --- |
| --- | Green wood sawmill | 9 VAC 5-80-720 B | Particulate Matter | --- |

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

None

PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the Blackstone COURIER-RECORD from
____[date]_____ to ____[date]_____. .